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March 16, 2023

VIA ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Sgt. Henriquez, and Officer Clement. I write respectfully to request a brief extension of time to file defendants' response to plaintiff's motion for a conference seeking to compel answers to requests for admission (See ECF No. 74), from today, March 16, 2023 to March 20, 2023. This is the first such request, which is made with consent of plaintiff. The undersigned apologizes for the delay in filing this request. Defendants were striving to meet the deadline of March 16, 2023, but require additional time to finalize the response, in light of other case commitments, including a trial in the S.D.N.Y., scheduled to begin on March 27, 2023 in Columna v. Gomez, et al., 19-cv-3801.

Thank you for your consideration herein.

Respectfully submitted,
/s/
John Schemitsch
Senior Counsel

cc: **VIA ECF**
Gideon Oliver, Esq.
Remy Green, Esq.
Attorneys for Plaintiff